

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
V.	§	CRIMINAL NO. 3:05-CR-332-G
KENNETH REVEN MCCLAIN	§	Judge Fish

**MOTION TO EXTEND TIME FOR FILING PRE-TRIAL MOTIONS**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COMES the Defendant, KENNETH REVEN MCCLAIN, by and through undersigned counsel and moves this Honorable Court to extend the date for filing Pre-Trial Motions from April 7, 2006, to April 14, 2006. In support of said motion, the Defendant would show unto the Court as follows:

I.

A plea offer has been extended to the Defendant and the deadline to accept the plea offer is April 14, 2006. Therefore, Defendant would request that the Pre-Trial Motions be due on the date the plea offer expires, in the event the plea offer is not accepted by the Defendant.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests this Honorable Court to grant this Motion for Extension of Time for Filing Pre-Trial Motions to April 14, 2006.

Respectfully submitted,

LAW OFFICE OF JAMES P. WHALEN, P.C.

s/James P. Whalen

JAMES P. WHALEN  
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COUNSEL FOR DEFENDANT  
KENNETH REVEN MCCLAIM

**CERTIFICATE OF CONFERENCE**

This is to certify that undersigned counsel was able to confer with Chad E. Meacham, the Assistant United States Attorney in charge of this case and he does not oppose the motion.

SIGNED this the 5<sup>th</sup> day of April, 2006.

s/James P. Whalen

JAMES P. WHALEN

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing motion was delivered to Chad E. Meacham, Esq., the Assistant United States Attorney in charge of this case, 1100 Commerce Street, Third Floor Dallas, Texas 75242, on this the 5<sup>th</sup> day of April, 2006.

s/James P. Whalen  
JAMES P. WHALEN

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**ORDER**

ON THIS DAY came on to be heard Defendant's Motion to Extend Time for Filing Pre-Trial Motions; and after having considered the pleadings and arguments of counsel, the Court is of the opinion that said motion should be and the same is hereby in all respects GRANTED and Pre-Trial Motions are due on or before April 14, 2006.

SIGNED THIS THE \_\_\_\_ day of \_\_\_\_\_, 2006.

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UNITED STATES DISTRICT JUDGE

**ORDER** – Page Solo